

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

RANDY LUNDY,

Plaintiff,

v.

HL MOTOR GROUP, INC., HIGHLIGHT  
MOTOR FREIGHT USA, INC., OLD  
REPUBLIC INSURANCE COMPANY,  
AND OGNJEN MILANOVIC,

Defendants.

Case No.: CIV-22-699-F

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FARMERS MUTUAL FIRE INSURANCE  
COMPANY OF OKARCHE,

Plaintiff,

v.

HL MOTOR GROUP, INC. and OGNJEN  
MILANOVIC,

Defendants.

Case No.: CIV-22-752-F

**NOTICE TO TAKE DEPOSITION OF  
CORPORATE REPRESENTATIVE PURSUANT TO RULE  
30(B)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

To: HL Motor Group, Inc.  
c/o Michael T. Franz, Esquire  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
1605 West Adams Street, Suite 300  
Chicago, Illinois 60661

And

Jeremy K. Schrag, Esquire  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
1605 North Waterfront Parkway, Suite 150  
Wichita, Kansas 67206

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Local Rule 30.1, Plaintiff Farmers Mutual Fire Insurance Company of Okarche, by and through its counsel of record, Gerard F. Pignato, of RYAN WHALEY, will take the oral examination of a corporate representative of the Defendant, HL Motor Group, on **Wednesday, April 5, 2023, beginning at 9:30 a.m. CST via Zoom**. Defendant shall designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf regarding the matters set forth in **EXHIBIT “1”** attached, and may the matters before each person who will testify. The examination shall begin as set forth above and shall continue from day-to-day until complete. You are invited to attend and cross-examine.

Respectfully submitted,

/s/ Gerard F. Pignato

GERARD F. PIGNATO, OBA #11473

MATTHEW C. KANE, OBA #19502

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*Attorneys for Plaintiff, Farmers Mutual  
Fire Insurance Company of Okarche*

**CERTIFICATE OF SERVICE**

☒ I hereby certify that on March 2, 2023, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Michael T. Franz, Esquire  
Jeremy K. Schrag, Esquire  
*Attorneys for Defendants*

Rodney D. Stewart, Esquire  
*Attorney for Plaintiff, Randy Lundy*

/s/ Gerard F. Pignato  
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For the Firm

**EXHIBIT “1”**

- (1) This Defendant’s denial of any of the allegations contained in numerical paragraph 4 in Plaintiff’s Petition, as set forth in this Defendant’s Answer.
- (2) Ognjen Milanovic’s driving record prior to the subject accident.
- (3) Any investigation conducted by this Defendant to determine the amount of money paid by Plaintiff to its insured, Earlene Carr under the insurance policy issued to Ms. Carr by FMFICO as a result of the subject accident and loss.
- (4) The amount of money this Defendant contends Plaintiff is owed by this Defendant or its insurance company.
- (5) If this Defendant contends FMFICO is not entitled to recover from this Defendant and/or its insurance company the insurance proceeds paid to and on behalf of Ms. Carr, as set forth in this Defendant’s Answer to numerical paragraph 7 in Plaintiff’s Petition, the factual basis for such position.
- (6) The factual basis for this Defendant’s first affirmative defense of unavoidable accident.
- (7) All evidence that supports this Defendant’s position that Ognjen Milanovic suddenly lost conscious while driving a Highlight tractor trailer on August 8, 2020.